

34. As a result of the foregoing, Defendants JOHN and JANE DOE POLICE OFFICERS, acting under color of state law, violated 42 U.S.C. § 1983 *et. seq.*, and deprived Plaintiff of rights secured by the Constitutions and laws of the United States and the State of New York, including those rights protected by the Fourth and Fourteenth Amendments, her right not to be deprived of life, liberty and property without due process of law, and other rights, privileges and immunities guaranteed by the laws and Constitution of the United States and the State of New York.

35. As a result of the foregoing, Plaintiff suffered loss of liberty and life, substantial emotional, mental and psychological pain, and was otherwise injured.

36. As a result of the foregoing, Plaintiff demands monetary damages against Defendants JOHN and JANE DOE POLICE OFFICERS and further seeks punitive damages against Defendants JOHN and JANE DOE POLICE OFFICERS in an amount to be determined by jury.

**AS AND FOR A THIRD CLAIM OF NEGLIGENT HIRING AND TRAINING
AGAINST DEFENDANT THE CITY OF NEW YORK**

37. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

38. The aforementioned occurrence took place by reason of the negligence of Defendant THE CITY OF NEW YORK, its agents, servants and/or employees, including various police officers regarding the hiring, retention, supervision and disciplining of the Defendants JOHN DOE POLICE OFFICERS and JANE DOE POLICE OFFICERS.

39. As a result of the foregoing, Plaintiff sustained personal injuries and other consequential damages.

40. As a result of the foregoing, Plaintiff demands monetary damages against Defendant THE CITY OF NEW YORK in an amount to be determined by a jury.

**AS AND FOR A FOURTH CLAIM FOR FALSE ARREST
AGAINST ALL DEFENDANTS**

41. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

42. As more fully described above, on or about July 5, 2013, Defendants JOHN and JANE DOE POLICE OFFICERS, acting without probable cause, intentionally, without justification and with deliberate indifference to the rights, life and liberty of Plaintiff, falsely arrested Plaintiff, detained her for over four hours, and forced her to remain handcuffed even while alone in a cell.

43. As a result of the foregoing, Plaintiff suffered loss of liberty and life, substantial physical, emotional, mental and psychological pain, and was otherwise injured.

44. As a result of the foregoing, Plaintiff demands monetary damages against all Defendants, including the CITY OF NEW YORK in an amount to be determined by jury.

**AS AND FOR AN FIFTH CLAIM FOR MALICIOUS PROSECUTION
AGAINST ALL DEFENDANTS**

45. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if fully set forth herein.

46. On or about July 5, 2013, Defendants, acting intentionally, maliciously and without justification or probable cause, caused to be filed an accusatory instrument or otherwise brought criminal charges against Plaintiff QUANDRALIN DOCKERY, who was criminally prosecuted therefore until such prosecution was terminated in her favor on or about September 23, 2013.

47. Defendants filed such charge knowing that such charge was false, because Plaintiff had committed no crime, and such charge was filed with malice and deliberate disregard for Plaintiff's rights.

48. As a result of the foregoing, Plaintiff was caused to suffer loss of liberty and life, substantial emotional, mental and psychological pain, and was otherwise injured.

49. As a result of the foregoing, Plaintiff demands monetary damages against all Defendants and is further seeking punitive damages against Defendants JOHN DOE POLICE OFFICERS and JANE DOE POLICE OFFICERS in an amount to be determined by a jury.

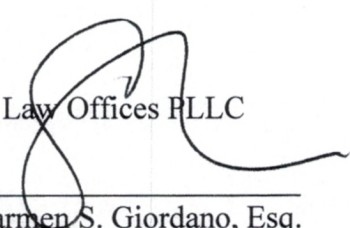
WHEREFORE, Plaintiff demands the following relief jointly and severally against all of the Defendants:

- a. Compensatory damages;
- b. Punitive damages against Defendants JOHN DOE POLICE OFFICERS and JANE DOE POLICE OFFICERS;
- c. Convening and empaneling of a jury to consider the merits of the claims herein;
- d. Costs and interest and attorney's fees;
- e. Such other and further relief as this court may deem appropriate and equitable.

Dated: New York, New York
January 16, 2014

Giordano Law Offices PLLC

By: _____


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